

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

Project Honey Pot, a dba of Unspam
Technologies, Inc.,

Plaintiff,

v.

No. 1:07CV419

John Does Injuring PHP and its Members
By Harvesting Email Addresses,
Transmitting Spam,
And Posting Comment Spam,

Defendants.

**NOTICE OF MOTION AND MOTION TO EXTEND TIME TO CONDUCT DISCOVERY NECESSARY TO
IDENTIFY AND SERVE DEFENDANTS, AND TO EXTEND RULE 4(M) DEADLINE TO NAME AND
SERVE DEFENDANTS**

PLEASE TAKE NOTICE that on September 7, 2007 at 10:00 a.m., or as soon thereafter as the matter may be heard, Plaintiff Project Honey Pot (“PHP”), by its Counsel, will present oral argument in support of its Motion to Extend Time to Conduct Discovery Necessary to Identify and Serve Defendants, and to Extend Rule 4(m) Deadline to Name and Serve Defendants.

Pursuant to Federal Rules of Civil Procedure 4(m) and 26(d), PHP hereby moves the Court to extend the time to conduct discovery necessary to identify and serve, and to extend the deadline to name and serve the John Doe Defendants. PHP has submitted a short Memorandum in support of its Motion.

Dated: August 30, 2007

Respectfully submitted,

/s/

Jon L. Praed
VSB #40678
Attorney for Plaintiff Project Honey Pot
Internet Law Group
4121 Wilson Boulevard, Suite 101
Arlington, Virginia 22203
Phone: (703) 243-8100
Fax: (703) 243-8162
jon.praed@i-lawgroup.com